

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

Oaxaco El Bey,)	
)	
Plaintiff,)	
)	
-v-)	CASE NO.: 4:15-cv-00560-DGK
)	
NCO Financial Systems, Inc.,)	
)	
Defendant.)	

**DEFENDANT NCO FINANCIAL SYSTEMS, INC.'S
MOTION TO DISMISS**

Now comes NCO Financial Systems, Inc., by and through the undersigned counsel, and pursuant to FED. R. CIV. P. 12(b)(6), hereby moves this honorable court to dismiss plaintiff's complaint, for the reason that Plaintiff has failed to state a claim for which relief may be granted. NCO relies on the suggestions of law filed contemporaneously herewith.

Respectfully Submitted,

/s/Krystle M. Dunn

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Attorneys for Defendant,

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CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2015, a copy of the foregoing was filed electronically in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to the parties by operation of the court's electronic filing system, at the address of counsel noted below. Parties may access this filing through the court's system.

A true copy was also sent via ordinary U.S. Mail, postage prepaid on July 28, 2015 to:

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Coral Springs, Florida 33067

/s/Krystle M. Dunn
Krystle M. Dunn